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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE GRIGSBY,

Defendant.

CASE NO. 1:22-CR-00150-ADA-BAM

STIPULATION TO VACATE STATUS
CONFERENCE AND SET CASE FOR CHANGE
OF PLEA AND ORDER THEREON

Court: Hon. Ana de Alba

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a STATUS CONFERENCE on October 11, 2023, at 1:00 p.m.

2. By this stipulation, defendant now moves to vacate the status conference and **set the case for a change of plea hearing on October 2, 2023 at 8:30 a.m.** before the Hon. Ana de Alba. The proposed change of plea date represents the earliest date that all counsel are available, taking into account counsels' schedules, defense counsels' commitments to other clients, and the court's available dates for a change of plea hearing.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes wiretap recordings, thousands of pages of investigative reports, surveillance video, audio recordings, cell phone extractions, and other voluminous materials. All of this discovery

has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

c) The government does not object to the continuance.

d) No time exclusion is necessary as time has previously been ordered excluded up to and including October 11, 2023.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 20, 2023

PHILLIP A. TALBERT
United States Attorney

By: /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

Dated: July 20, 2023

/s/ Steve Crawford
Attorney for Defendant Andre Grigsby

IT IS SO ORDERED.

Dated: July 26, 2023


UNITED STATES DISTRICT JUDGE